

From: ["Saric, James" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP \(FYDIBOHF23SPDLT\)/CN=RECIPIENTS/CN=1563015DBEEE49A1AEA479C55929F0D1-JSARIC>](mailto:JSARIC@EXCHANGELABS.COM)
To: Jeff.Keiser@CH2M.com
CC:
Date: 1/30/2013 10:47:49 AM
Subject: EPA/CH2MHILL Draft Area 1 FS Comments
Attachments: [Predraft Area 1 FS comments CH2MHILL EPA 01-30-2013.docx](#)

Jeff:

Enclosed is a copy of the Draft comments for the Area 1 FS. It incorporates all of CH2MHILLs comments along with my comments and my attorney's comments. I have also taken the three MDEQ comments we discussed and tweaked them to incorporate them. So, please take a look at those. I'll need you to format these comments and make sure everyone on your end is okay with these. Also, if there is another MDEQ issue/comment you want to add, please include that. Please change CH2MHILL in the actual comments to EPA. However, I can do that later as well.

Another thing to consider, regarding RAO 1 I know there are some people here in Region 5 that are uncomfortable with fish tissue targets and timeframes. Like Patty, I understand that the question will be what happens if the fish don't get to 0.2 ppm within 10 years? Given Kern's analysis we may want to consider, after GP reviews the comments, the thought of extending the timeframe to 20 years post remedy. Just something for everyone to consider.

I would like to get these comments to GP on Tuesday at the latest, so if you could get them back to me by Monday that would be great. Hopefully, the funding will be approved today.

On another note, I have John Canar and my FIELDS group looking at the stream tube SWAC calculations as described in Appendix J of the RI report and looking into the write-up developed by KERN. Also, I am having them look at the SWAC calculations we did for Portage Creek. I would like to work together with GP to develop a SWAC calculation that we all believe is appropriate and use it for all areas. Also, I want to make sure that both Portage Creek pre and post TCRA and the Plainwell Impoundments have SWACs established based upon post-TCRA information, or at least the latest information we have. One of my thoughts is that if the Portage Creek and Plainwell post-TCRA SWACs are greater than 1 ppm; and sub-area 2, 3 and 4 are also greater than 1, doing any action in those sub-areas doesn't guarantee that fish tissue concentrations throughout the entire Area 1 will get to 0.2 ppm for SMB. So there is uncertainty associated with completing an action in those areas.

Jim